Mora-San Miguel Electric Cooperative, Inc. Electric Service Curtailment Procedures Board Policy No. 227

Purpose:

The purpose of this Procedure is to establish electric curtailment procedures in the event that curtailments of firm electric service to Mora-San Miguel Electric Cooperative (MSMEC) are required. This procedure is intended to address the New Mexico Public Regulatory Commission Requirement under Rule 560 (17.9.560.15 F).

Background:

MSMEC is a full electric requirements cooperative member of Tri-State Generation and Transmission Association, Inc. (Tri-State). Tri-State is responsible for ensuring the overall reliability of the transmission of power and energy to MSMEC. Tri-State registered with the North American Electric Reliability Corporation (NERC) as the Transmission Operator responsible for the delivery of power and energy to MSMEC. As the NERC Transmission Operator, Tri-State is required to comply with the NERC Reliability Standards and may be required under the NERC Reliability Standards to shed or curtail MSMEC member consumer load without notice or warning. Tri-State Board of Directors Policy 116, (Member System Load Shedding Policy), reaffirms the responsibly of Tri-State to maintain the integrity and reliability of the overall transmission system by shedding firm MSMEC member consumer load when, at the sole discretion of the Tri-State NERC Certified System Operator, the overall reliability of the interconnected transmission system becomes threatened due to, but not limited to the following:

- Transmission System Disturbances
- > Equipment Failures
- Overloaded Transmission Elements
- Sudden Loss of Generating Units
- System Frequency Excursions
- General Shortage of Regional Generation
- Restoration of Operating Reserves
- Restoration of interconnection after separation
- Address Voltage depression / Voltage issues
- > Following an automatic under frequency load shed action

Electric Load Curtailment and Priorities:

Curtailment of Electric Services may be necessary due to emergency conditions originating within the MSMEC electric system or originating outside the MSMEC system, reducing the amount of electric power available to maintain the overall reliability of the transmission systems that delivery energy and power to MSMEC.

The Reliability Coordinator (RC) for the Balancing Area containing MSMEC member load is the California Independent System Operator (CAISO). The CAISO RC is the entity that is the highest level of authority who is responsible for the reliable operation of the bulk electric system, has the wide area view of the bulk electric system, and has the operating tools, processes and procedures, including the authority to prevent or mitigate emergency operating situations in both next-day analysis and real-time operations. The RC has the purview that is broad enough to enable the calculation of Interconnection Reliability Operating Limits, which may be based on the operating parameters of transmission systems beyond any Transmission Operator's vision

The Tri-State NERC Certified System Operator is statutorily obligated to comply will all Operating Instructions provided the RC and as such Tri-State must comply with any Operating Instructions of the RC to shed or curtail firm load to preserve the bulk electric system reliability and prevent uncontrolled cascading of outages across the bulk electric system.

Provided by the NERC Reliability Standards and Tri-State Board policy, the Tri-State NERC Certified System Operator has clear decision-making authority to act and to direct actions to be taken by MSMEC and others with in the Tri-State's Reliability Coordinators area to preserve the integrity and reliability of the Bulk Electric System. This is likely to take the form of load shedding within MSMEC's distribution system.

MSMEC member consumer load curtailments are employed as necessary to maintain an adequate level of system reliability and to avoid cascading outages. Notices of load curtailment when known by the Tri-State System Operator will be provided to MSMEC so that MSMEC can prepare for the curtailment. Note however, that in many cases it is not possible for advance notice to be provided as action to prevent cascading outages must be done without delay. In the case that Tri-State provides notice of future curtailment requirements MSMEC shall coordinate with the Tri-State System Operator to identify and implement the load curtailment requirement to meet the overall system load shed requirements set forth by the RC or the Balancing Authority. Notices will usually be necessary to address threats to the delivery of electricity outside of MSMEC's system. MSMEC response shall be implemented without delay and shall occur within 30 minutes of such notice.

Tri-State Manual Load Shedding Plans

Tri-State maintains procedures to perform manual load shed when necessary. Each event requiring load shed is unique and thus will require a unique approach to implement the required load shed and restore overall system reliability. Tri-State maintains load manual load shedding tools that are incorporated into the Tri-State Energy Management System (EMS). These load shedding tools are arranged by region and by Balancing Authority area and provide the means for the Tri-State System Operator to shed load without delay. Many times load shedding is required it is due to overall system generation deficiency. Overall generation deficiency is likely to extend for hours before the generation / load balance can be restored. Tri-State's procedures call for the "burden" of load shed to be spread to all users of the Tri-State transmission system. To spread the burden the Tri-State System Operator, whenever possible, will rotate the load shed requirement to another Tri-State transmission customer and allow the original "first action" load to be restored after one-hour. This rotation of load shed will be continued for each hour the load shed event is required. Due to the nature of load shedding the first action load shed must be done without delay and without notice. After the first action load shed has been accomplished Tri-State will identify the next load to be shed and will work with the next member prior to the load shedding to communicate and identify the load(s) to be shed so that proper notices can be provided.

The following curtailment priorities shall apply to MSMEC member consumers:

- 1. Storrie Lake Substation
- 2. Rowe Substation
- 3. Rainsville Substation

Incident Commander:

For any event that requires unplanned interruption of electric service to MSMEC Consumer load an Incident Commander (IC) shall be appointed by MSMEC to act as a single point of contact between designated emergency personnel in each community served by MSMEC in the event of a system emergency requiring unplanned forced load shedding. The MSMEC IC shall be Operations Manager: Lazaro "Larry" Barela (575-760-2256)

Notification of MSMEC Member Consumers:

During the load shed event, MSMEC shall as time allows take appropriate action to provide notification to MSMEC Member Consumers of the curtailment actions in progress or that will be administered by Tri-State and MSMEC.

Notification to New Mexico Public Regulation Commission:

New Mexico Public Regulation Commission (NMPRC) 17.5.410.34 allows MSMEC to discontinue electric service without notices for reasons of operation, maintenance, health, safety or a state of emergency.

Following an unplanned interruption NMPRC Rule 17.9.560.15 E requires the following:

- (4) Each utility shall report the following information.
- (a) A major interruption of service is defined as an unscheduled interruption of service of more than 30 minutes in duration, affecting:
 - (i) more than 10% of a utility's New Mexico jurisdictional load or more than 100 MW of its New Mexico jurisdictional load, whichever is less; or
 - (ii) substantially all of a New Mexico municipality or county; or
 - (iii) any of the utility's customers of at least 1 MW (based on the most recent demand billing information on the date of the major interruption). (
 - (b) Within two (2) hours of the commencement of a major interruption of service (or no later than 9:00 AM the following business day for outages occurring after 4:00 PM or on a weekend), the utility division of the commission shall be notified telephonically, by facsimile or by-email of the occurrence with a brief description of the occurrence.
 - (c) Within three (3) business days a written report shall be filed with the records division of the commission. The written report shall contain the pertinent information on the outage including, but not limited to, time of occurrence, duration, cause, facilities affected, MW of load lost, MWH of lost sales, estimated number of consumers affected, municipalities and counties wholly or partially interrupted, and actions taken by the utility to connect and prevent recurrence of the outage.
 - (d) Utilities that submit reports of an interruption to any coordinating council, regional transmission group or other industry review shall concurrently submit copies to the records division of the commission, including any engineering reports associated with an interruption. Each utility shall provide to commission staff all information requested by staff that is reasonably needed to assess the situation.
- (5) Each utility shall identify critical customers, including facilities that require electricity to perform essential life-health-safety services, including other utility services such as natural gas compression, to establish priority of service and to minimize curtailments to these customers.
- (6) Each utility shall identify an emergency coordinator to act as a single point of contact between designated emergency personnel in each community served by the utility in the event of a system emergency.

Informing NMPRC of electric power curtailments:

Option 1.

Dial Toll Free 1-855-544-2005

Provide following information at the prompts

- 1. Name of Utility Reporting
- 2. Areas Affected
- 3. Number of Affected Consumers
- 4. Time of outages/curtailment occurred
- 5. Reason for the outage and other relevant details
- 6. Length of outage if known or anticipated length of outage
- 7. Persons reporting name and phone number

Option 2.

Send email with the requested information above (Numbers 1-7) to Utility.outage@state.nm.us

Use of either option is available to the regulated entity reporting.

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Virginia Mondragon, Secretary/Treasurer